

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN

Clarence Dean, Personal Representative  
Of the Estate of Jesse Dean,

Plaintiff,

v.

Case No.: 1:23-cv-00408  
Hon. Ray Kent  
District Judge Robert J. Jonker

County of Calhoun, Michigan, United States  
of America, Ashlei Packer, RN, Nathan Meyer, RN,  
Eir Pratt, LNP, Megan Greenlee, RN, Jessica  
Godzieblewski, RN, Health Services Administrator,  
Paul Troost, DO., and John and Jane Does,

Defendants.

---

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**DEFENDANTS ASHLEI PACKER, RN, NATHAN MEYER, RN, EIR PRATT, LNP, MEGAN GREENLEE, RN, JESSICA GODZIEBLEWSKI, RN, HEALTH SERVICES ADMINISTRATOR, AND PAUL TROOST, DO'S RESPONSE IN OPPOSITION TO PLAINTIFF'S PARTIALLY ASSENTED TO REQUEST FOR EXTENSION OF TIME TO AMEND DEADLINE TO FILE SECOND AMENDED COMPLAINT**

NOW COME Defendants, ASHLEI PACKER, RN, NATHAN MEYER, RN, EIR PRATT, LNP, MEGAN GREENLEE, RN, JESSICA GODZIEBLEWSKI, RN, HEALTH SERVICES ADMINISTRATOR, and PAUL TROOST, DO, by and through their attorneys, FOLEY, BARON, METZGER & JUIP, PLLC, and for their Response in Opposition to Plaintiff's Partially Assented to Request For Extension of Time to Amend Deadline to File Second Amended Complaint, hereby state as follows:

Defendants request this Honorable Court deny Plaintiff's Motion for Leave to Amend his Complaint because amendment would be futile and therefore denying leave to extend the deadline to amend the complaint is proper.

Defendants' arguments are laid out more fully in the attached brief in support, incorporated by reference herein.

WHEREFORE, the undersigned respectfully requests that this Honorable Court deny Plaintiff's Partially Assented To Request For Extension Of Time To Amend Deadline To File Second Amended Complaint.

Dated: February 21, 2024

Respectfully Submitted,

By: /s/ Catherine M. Rodey

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Catherine M. Rodey (P83529)

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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN

Clarence Dean, Personal Representative  
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Case No.: 1:23-cv-00408  
Hon. Ray Kent  
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of America, Ashlei Packer, RN, Nathan Meyer, RN,  
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Defendants.

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**BRIEF IN SUPPORT OF DEFENDANTS ASHLEI PACKER, RN, NATHAN MEYER, RN, EIR PRATT, LNP, MEGAN GREENLEE, RN, JESSICA GODZIEBLEWSKI, RN, HEALTH SERVICES ADMINISTRATOR, AND PAUL TROOST, DO'S RESPONSE IN OPPOSITION TO PLAINTIFF'S PARTIALLY ASSENTED TO REQUEST FOR EXTENSION OF TIME TO AMEND DEADLINE TO FILE SECOND AMENDED COMPLAINT**

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**CONCISE STATEMENT OF THE REASONS IN SUPPORT OF  
DEFENDANTS' POSITION**

Defendants Ashlei Parker, RN, Nathan Meyer, RN, Eir Pratt, LPN, Megan Greenlee, RN, Jessica Godzieblewski, RN, and Paul Troost, DO, respectfully request this Honorable Court DENY Plaintiff's Partially Assented to Request for Extension of Time to Amend Deadline to File Second Amended Complaint, as Plaintiff has not shown good cause to add CHS TX, Inc. as a defendant to this case. CHS TX, Inc. is not Corizon and has not agreed to be liable for Corizon. Moreover, amendment of Plaintiff's Complaint to add CHS TX, Inc. would be futile as the statute of limitations to bring a claim against CHS TX, Inc. has expired.

**CONTROLLING OR MOST APPROPRIATE  
AUTHORITY FOR THE RELIEF SOUGHT**

<u>Cases</u>	<u>Page(s)</u>
<i>Beydoun v. Sessions</i> , 871 F.3d 459, 469 (6 <sup>th</sup> Cir. 2017) .....	2
<i>Foman v. Davis</i> , 371 U.S. 178, 182, 83 S. Ct. 227, 9 L. Ed. 2d 222 (1962).....	2
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 <u>Local Rules</u>	 <u>Page(s)</u>
Local Civil Rule 7.3(b)(i) .....	6



## **I. BRIEF STATEMENT OF FACTS**

On or about December 31, 2020, Jesse Dean, an Immigration Customs Enforcement (ICE) detainee, was taken to Calhoun County Jail for incarceration. While at Calhoun County Jail, Mr. Dean received treatment by various medical providers, including the named Defendants Ashlei Parker, RN, Nathan Meyer, RN, Eir Pratt, LPN, Megan Greenlee, RN, Jessica Godzieblewski, RN, and Paul Troost, DO. On February 5, 2021, Mr. Dean passed away due to an ulcer.

## **II. PROCEDURAL HISTORY**

On April 19, 2023, Plaintiff filed his 42 USC § 1983 federal civil rights complaint against Calhoun County, United States of America, Ashlei Parker, RN, Nathan Meyer, RN, Eir Pratt, LPN, Megan Greenlee, RN, Jessica Godzieblewski, RN, Paul Troost, DO, (fnu) Fish, and John and Jane Does, involving medical treatment provided to Plaintiff's Decedent, Jesse Dean, while he was held at the Calhoun County Jail. (ECF No. 1). On November 30, 2023, Plaintiff filed their First Amended Complaint removing "(fnu) Fish" as a defendant. (ECF No. 39).

The Case Management Order (CMO) entered by this Court on December 1, 2023 requires that motions to amend pleadings must be filed by December 31, 2023. (ECF No. 40). Plaintiff previously filed a motion to extend the December 31, 2023 deadline to move to amend his complaint. (ECF No. 54). That motion was denied by this Court on January 5, 2024, because, *inter alia*, Plaintiff failed to show good cause to amend the deadline. (ECF No. 55). Plaintiff now seeks to renew his motion to extend the deadline to file an amended complaint by simply reiterating the same reasons that this court has already found not to be good cause. (ECF No. 63; ECF No. 63-1).

### **III. STANDARD OF REVIEW**

Pursuant to Fed. R. Civ. P. 15(a)(2), a party not amending its pleading as a matter of course, may only amend its pleading with the opposing party's written consent or the court's leave. "[T]he grant or denial of an opportunity to amend is within the discretion of the District Court." *Foman v. Davis*, 371 U.S. 178, 182, 83 S. Ct. 227, 9 L. Ed. 2d 222 (1962). However, denial of amendment to the Complaint is proper when there is "undue delay, bad faith or dilatory motive on the part of the movant, repeated failure to cure deficiencies by amendments previously allowed, undue prejudice to the opposing party by virtue of allowance of the amendment, [and/or] futility of amendment". *Id.* "A proposed amendment is futile if the amendment could not withstand a Rule 12(b)(6) motion to dismiss." *Beydoun v. Sessions*, 871 F.3d 459, 469 (6<sup>th</sup> Cir. 2017) (citations omitted). Fed. R. Civ. P. 12(B)(6) permits dismissal of a Complaint when it has failed to state a claim upon which relief can be granted.

### **IV. ARGUMENT**

#### **A. Amendment of Plaintiff's Complaint would be Futile.**

Denial of amendment to a complaint is proper when the amendment would be futile. *Foman v. Davis*, *supra*, at 182. Plaintiff is seeking an extension of the deadline to file a second amended complaint to add CHS TX, Inc. as a defendant. However, as discussed below, any such amendment would be futile. Therefore, denial of Plaintiff's request is proper.

**(i) Plaintiff has not shown good cause that CHS TX, Inc. is the proper party in interest to justify amendment.**

Defendants Ashlei Parker, RN, Nathan Meyer, RN, Eir Pratt, LPN, Megan Greenlee, RN, Jessica Godzieblewski, RN, and Paul Troost, DO provided medical treatment to Plaintiff's decedent, Jesse Dean, at Calhoun County Jail while employees of Corizon. Corizon is currently involved in a bankruptcy case that has necessitated a stay of proceedings in any other lawsuit to which it is a named party. In order to get around a stay, Plaintiff alleges that Corizon's obligations have been transferred to CHS TX, Inc., and for that reason, Plaintiff wants to add them as a party to this lawsuit instead of Corizon. Plaintiff has not provided any evidence in support of this allegation or provided any legal basis showing CHS TX, Inc. is liable for Corizon.

Furthermore, Defendants Ashlei Parker, RN, Nathan Meyer, RN, Eir Pratt, LPN, Megan Greenlee, RN, Jessica Godzieblewski, RN, and Paul Troost, DO were employed by Corizon, not CHS TX, Inc., at the time period at issue in this case. Corizon and CHS TX, Inc. are legally separate business entities in both Texas and Michigan. (See **Exhibit A**, Texas Secretary of State Business Organization documents, and **Exhibit B**, Michigan LARA documents). Plaintiff has not produced any evidence showing CHS TX, Inc. has any involvement in this matter and has not shown good cause to amend their Complaint to add CHS TX, Inc.

**(ii) The Statute of Limitations to file a claim against CHS TX, Inc. has expired.**

The statute of limitations for § 1983 claims is "that which the State provides for personal-injury torts". *Wallace v. Kato*, 549 U.S. 384, 387 (2007). Under Michigan law, "the period of limitations is 3 years after the time of the death or injury for all actions to

recover damages for the death of a person or for injury to a person or property.” Mich. Comp. Laws § 600.5805(2).

Plaintiff’s Decedent, Jesse Dean, was transferred to Calhoun County Jail on December 31, 2020. (ECF No. 39, PageID 243). Mr. Dean passed away on February 5, 2021. (ECF No. 39, PageID 250). Any claims for deliberate indifference for actions and/or inactions by the Defendants during that time period are subject to a 3-year statute of limitations. As such, Plaintiff must have filed a complaint against CHS TX, Inc. by February 5, 2024 in order to pursue claims against them. Plaintiff has not filed a complaint against CHS TX, Inc. within the applicable statute of limitations and has no legal basis to pursue claims against CHS TX, Inc. in this matter.

#### **V. CONCLUSION AND RELIEF SOUGHT**

Plaintiff’s claims in an amended complaint against CHS TX, Inc. would not survive a 12(B)(6) motion to dismiss thus amendment would be futile. Not only has Plaintiff not shown that CHS TX, Inc. is a proper party in interest, Plaintiff’s time to file any claims against CHS TX, Inc. has expired. As such, denial of leave for Plaintiff to file an amended complaint would be proper.

WHEREFORE, the undersigned respectfully requests that this Honorable Court deny Plaintiff’s Partially Assented To Request For Extension Of Time To Amend Deadline To File Second Amended Complaint.

Dated: February 21, 2024

Respectfully Submitted,

By: /s/ Catherine M. Rodey  
Randall A. Juip (P58538)  
Brian J. Richtarcik (P49390)  
Catherine M. Rodey (P83529)  
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**CERTIFICATE OF COMPLIANCE WITH LCivR 7.3**

I, Catherine M. Rodey, certify that this brief complies with Local Civil Rule 7.3(b)(i) and contains **1253** words, the count of which was generated using the word-count feature on Microsoft Word.

Dated: February 21, 2024

Respectfully Submitted,

By: /s/ Catherine M. Rodey  
Catherine M. Rodey (P83529)  
Foley, Baron, Metzger & Juip, PLLC

**CERTIFICATE OF SERVICE**

I hereby certify that on February 21, 2024, I presented the foregoing paper to the Clerk of the Court for filing and uploading to the ECF system, which will send notification of such filing to the attorneys of record listed herein.

/s/ Catherine Rodey

# **EXHIBIT A**



TEXAS SECRETARY of STATE  
JANE NELSON

BUSINESS ORGANIZATIONS INQUIRY - VIEW ENTITY

Filing Number:

804552857

Entity Type:

Domestic For-Profit Corporation

Original Date of Filing:

May 3, 2022

Entity Status:

In existence

Formation Date:

N/A

Tax ID:

32084416695

FEIN:

Duration:

Perpetual

Name:

CHS TX, Inc.

Address:

205 POWELL PL STE 104  
Brentwood, TN 37027-7522 USA

<a href="#">REGISTERED AGENT</a>	<a href="#">FILING HISTORY</a>	<a href="#">NAMES</a>	<a href="#">MANAGEMENT</a>	<a href="#">ASSUMED NAMES</a>	<a href="#">ASSOCIATED ENTITIES</a>	<a href="#">INITIAL ADDRESS</a>
Name		Address			Inactive Date	
C T Corporation System		1999 Bryan St., Ste. 900 Dallas, TX 75201-3136 USA				

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TEXAS SECRETARY of STATE  
JANE NELSON

BUSINESS ORGANIZATIONS INQUIRY - VIEW ENTITY

<b>Filing Number:</b>	10067306	<b>Entity Type:</b>	Foreign Limited Liability Company (LLC)
<b>Original Date of Filing:</b>	July 5, 1994	<b>Entity Status:</b>	In existence
<b>Formation Date:</b>	N/A		
<b>Tax ID:</b>	14312813125	<b>FEIN:</b>	431281312
<b>Name:</b>	Corizon, LLC		
<b>Address:</b>	103 Powell Court Brentwood, TN 37027 USA		
<b>Fictitious Name:</b>	N/A		
<b>Jurisdiction:</b>	MO, USA		
<b>Foreign Formation Date:</b>	December 31, 2013		

<a href="#">REGISTERED AGENT</a>	<a href="#">FILING HISTORY</a>	<a href="#">NAMES</a>	<a href="#">MANAGEMENT</a>	<a href="#">ASSUMED NAMES</a>	<a href="#">ASSOCIATED ENTITIES</a>	<a href="#">INITIAL ADDRESS</a>
<b>Name</b>		<b>Address</b>			<b>Inactive Date</b>	
C T Corporation System		1999 Bryan St., Ste. 900 Dallas, TX 75201-3136 USA				

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# **EXHIBIT B**

# LARA Corporations Online Filing System

## Department of Licensing and Regulatory Affairs

**ID Number: 802911090**[Request certificate](#)[Return to Results](#)[New search](#)**Summary for: CHS TX, INC.****The name of the FOREIGN PROFIT CORPORATION:** CHS TX, INC.**Entity type:** FOREIGN PROFIT CORPORATION**Identification Number:** 802911090**Date of Qualification in Michigan:** 09/06/2022**Incorporated under the laws of:** the state of Texas**Purpose:****Term:** Perpetual**Most Recent Annual Report:** 2023**Most Recent Annual Report with Officers & Directors:** 2023**The name and address of the Resident Agent:**

Resident Agent Name: C T CORPORATION SYSTEM

Street Address: 40600 ANN ARBOR ROAD E STE 201

Apt/Suite/Other:

City: PLYMOUTH

State: MI

Zip Code: 48170

**Registered Office Mailing address:**

P.O. Box or Street Address: 103 POWELL COURT

Apt/Suite/Other:

City: BRENTWOOD

State:

Zip Code: 37027

**The Officers and Directors of the Corporation:**

Title	Name	Address
PRESIDENT	F JEFFERY SHOLEY	205 POWELL PLACE SUITE 104 BRENTWOOD, TN 37027 USA
TREASURER	DR. GREGG LADELE	205 POWELL PLACE SUITE 104 BRENTWOOD, TN 37027 USA
SECRETARY	J SCOTT KING	205 POWELL PLACE SUITE 104 BRENTWOOD, TN 37027 USA
DIRECTOR	DR. GREGG LADELE	205 POWELL PLACE SUITE 104 BRENTWOOD, TN 37027 USA
DIRECTOR	F JEFFERY SHOLEY	205 POWELL PLACE SUITE 104 BRENTWOOD, TN 37027 USA
DIRECTOR	J SCOTT KING	205 POWELL PLACE SUITE 104 BRENTWOOD, TN 37027 USA

**Acts Subject To:** 284-1972 Business Corporation Act

Total Authorized Shares	Shares Attributable to Michigan	Most Recent Apportionment %	Year Ending
15,000	60,000	1.4746%	2022

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**View filings for this business entity:**

- ALL FILINGS  
ANNUAL REPORT/ANNUAL STATEMENTS  
CERTIFICATE OF CORRECTION  
CERTIFICATE OF CHANGE OF REGISTERED OFFICE AND/OR RESIDENT AGENT  
RESIGNATION OF RESIDENT AGENT  
CERTIFICATE OF ASSUMED NAME

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# LARA Corporations Online Filing System

Department of Licensing and Regulatory Affairs

ID Number: 801025644

[Request certificate](#)[Return to Results](#)[New search](#)Summary for: **CORIZON HEALTH, INC.**The name of the **FOREIGN PROFIT CORPORATION**: CORIZON HEALTH, INC.

The name used to transact business in Michigan: CORIZON OF MICHIGAN

The prior true name in home state: PRISON HEALTH SERVICES, INC. **changed on:** 07-02-2012

Entity type: FOREIGN PROFIT CORPORATION

Identification Number: 801025644 Old ID Number: 639354

Date of Qualification in Michigan: 09/25/2000

Incorporated under the laws of: the state of Delaware

Purpose:

Term: Perpetual

Most Recent Annual Report: 2022

Most Recent Annual Report with Officers &amp; Directors: 2022

**The name and address of the Resident Agent:**

Resident Agent Name: THE CORPORATION COMPANY

Street Address: 40600 ANN ARBOR RD E

Apt/Suite/Other: SUITE 201

City: PLYMOUTH

State: MI

Zip Code: 48170

**Registered Office Mailing address:**

P.O. Box or Street Address: 205 POWELL PLACE, BRENTWOOD, TN 37027

Apt/Suite/Other: SUITE 104

City: BRENTWOOD

State: TN

Zip Code: 37027

**The Officers and Directors of the Corporation:**

Title	Name	Address
PRESIDENT	SARA TIRSCHWELL	205 POWELL PLACE SUITE 104 BRENTWOOD, TN 37027 USA
TREASURER	F. JEFFREY SHOLEY	205 POWELL PLACE SUITE 104 BRENTWOOD, TN 37027 USA
SECRETARY	J. SCOTT KING	205 POWELL PLACE SUITE 104 BRENTWOOD, TN 37027 USA
DIRECTOR	ISAAC LEFKOWITZ	205 POWELL PLACE SUITE 104 BRENTWOOD, TN 37027 USA
DIRECTOR	DAVID GEFNER	205 POWELL PLACE SUITE 104 BRENTWOOD, TN 37027 USA
DIRECTOR	ABE GOLDBERGER	205 POWELL PLACE SUITE 104 BRENTWOOD, TN 37027

		USA
DIRECTOR	JAY LEITNER	205 POWELL PLACE SUITE 104 BRENTWOOD, TN 37027 USA
DIRECTOR	SARA TIRSCHWELL	205 POWELL PLACE SUITE 104 BRENTWOOD, TN 37027 USA

Total Authorized Shares	Shares Attributable to Michigan	Most Recent Apportionment %	Year Ending
1,000	60,000	18.5361%	2021

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